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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JEFFREY B. GUINN,

Appellant.

CDR INVESTMENTS, LLC, a Nevada  
limited liability company; DONNA A.  
RUTHE, as trustee for the CHARLES L.  
RUTHE TRUST and on behalf of his  
Individual Retirement Account; DONNA  
A. RUTHE, in her representative capacity  
as trustee for the FRANK E. GRANIERI  
REVOCABLE LIVING TRUST,

Respondents,

Case No. BK-S-13-18986-BTB  
CHAPTER 7

Adversary No. BK-S-14-01007-BTB

Case No. 2:19-cv-00649-JAD

**STIPULATION TO EXTEND BRIEFING  
SCHEDULE FOR APPEAL DUE TO  
COVID-19 PANDEMIC**

**(Third Request)**

**ORDER**

Respondents CDR INVESTMENTS, LLC, a Nevada limited liability company; DONNA  
A. RUTHE, as trustee for the CHARLES L. RUTHE TRUST and on behalf of his Individual  
Retirement Account; DONNA A. RUTHE, in her representative capacity as trustee for the  
FRANK E. GRANIERI REVOCABLE LIVING TRUST (collectively, the “Respondents”), by  
and through their attorneys of record, the law offices of Sylvester & Polednak, Ltd., and

1 Appellant JEFFREY B. GUINN (“Appellant”), by and through his attorneys of record Bailey  
2 Kennedy, hereby STIPULATE AND AGREE to continue the Answering Brief and Reply Brief  
3 deadlines in the appeal thirty (30) days, as follows:  
4

- 5 1. A National Emergency related to the impact of the COVID-19 global  
6 pandemic has been declared along with emergency declarations by several  
7 states across the United States, including Nevada.
- 8 2. The Parties, their counsel, and all related individuals are focused, first and  
9 foremost, on health and safety matters during this global pandemic and each  
10 Party has issues with limited staffing and resources, limited access to files  
11 and other resources, and other hurdles related to social distancing and  
12 business and school closures.
- 13 3. Most, if not all, state courts and all federal courts in Nevada have recognized  
14 the need for stays/postponements of litigation matters and cases.
- 15 4. Undersigned counsel, who is primarily responsible for the Answering Brief,  
16 was working remotely to achieve social distancing objectives until very  
17 recently on April 29. While he was able to complete certain tasks, he could  
18 not work nearly as efficiently as he was able to do from his office.  
19 Furthermore, during his time working remotely, undersigned counsel was  
20 limited in his ability to confer with other attorneys responsible for this  
21 matter.  
22 5. Moreover, the Memorandum Decision that is the subject of this appeal is  
23 quite lengthy (115 pages). The underlying adversary proceeding trial was  
24 three weeks long. And as shown by the Designation of Record and  
25  
26  
27  
28

Statement on Appeal [Dkt. # 463], there are numerous relevant exhibits.  
Thus, this appeal is more complicated than a typical adversary proceeding appeal.

6. Due to the above, the Parties respectfully request an extension to the current briefing schedule, moving all dates back thirty (30) days, as follows:

- Answering Brief deadline extended to July 8, 2020; and
- Reply Brief deadline extended to August 7, 2020.

IT IS SO STIPULATED.

DATED this 20<sup>th</sup> day of May, 2020.

DATED this 20<sup>th</sup> day of May, 2020.

**SYLVESTER & POLEDNAK, LTD.**

**BAILEY KENNEDY**

By /s/ Matthew T. Kneeland

By /s/ Joseph Liebman

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IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE  
Dated: May 20, 2020.